

WESTERN WASHINGTON LAW
GROUP PLLC
Dennis McGlothlin (WSBA No. 28177)
P.O. Box 468
Snohomish, WA 98291
Tel: 425/728-7296
425/955-5300 (fax)
Dennis@westwalaw.com

BLOOD HURST & O'REARDON, LLP
Timothy G. Blood (CA 149343)
(Applicant for pro hac vice admission)
Thomas J. O'Reardon II (CA 247952)
Paula R. Brown (CA 254142)
501 West Broadway, Suite 1490
San Diego, CA 92101
Tel: 619/338-1100
619/338-1101 (fax)
tblood@bholaw.com
toreardon@bholaw.com
pbrown@bholaw.com

*Attorneys for Jun Dam and the Class in
Dam v. Perkins Coie, LLP, et al.,
Case No. 2:20-cv-00464-SAB (E.D. Wash.)*

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, INC., a Washington
corporation,

Debtor.

Case No: 18-03197 FPC 7

Hon. Frederick P. Corbit
Chapter 7

**MOTION TO ADMIT ATTORNEY
TIMOTHY G. BLOOD PRO HAC
VICE UNDER LOCAL CIVIL
RULE 83.2(c)(3)**

[No Hearing Requested]

Attorney Timothy G. Blood, the managing partner of Blood, Hurst & O'Reardon, LLP respectfully moves this Court under Eastern District of Washington LBR 9010-1 and Eastern District L. Civ. R. 83.2(c) for an order granting the *pro hac vice* admission of Timothy G. Blood ("Applicant").

Local Civil Rule 83.2(c)(3) Compliance

Movant and Applicant submit the following information as required by Eastern District L. Civ. R. 8.2(c)(3). The information is confirmed and attested to in the accompanying Declaration of Timothy G. Blood.

A. Applicant's address and telephone number

Blood Hurst & O'Reardon, LLP
501 West Broadway, Suite 1490
San Diego, CA 92101
Tel: (619) 338-1100

B. Dates of admission to practice before other courts

Mr. Blood is admitted to practice in the following courts:

- California State Courts as of 12/5/1990 (CA 149343)
- U.S. District Court, Southern District of California as of 12/5/1990
- U.S. District Court, Central District of California as of 12/2/1992
- U.S. District Court, Northern District of California as of 7/16/1997
- U.S. District Court, Eastern District of California as of 7/13/2003
- Ninth Circuit Court of Appeals as of 6/25/1997
- United States Supreme Court as of 1/25/2016
- United States Circuit Court of Appeals for the Second (4/11/2017), Third (3/6/2008), Fifth (4/6/2000), Sixth (9/23/1999), Eighth (4/20/2001) and Eleventh Circuits (8/4/2000)
- United States District Courts for the E.D. Arkansas (11/19/2003), W.D. Arkansas (11/19/2003), N.D. Illinois (1/20/2016) and E.D. Michigan (5/20/2010)

1 **C. Name, address and telephone number of admitted counsel with**
2 **whom the Applicant will be associated**

3 Dennis McGlothin (WSBA No. 28177)
4 Western Washington Law Group PLLC
5 P.O. Box 468
6 Snohomish, WA 98291
7 Tel: 425/728-7296
8 425/955-5300 (fax)
9 Dennis@westwalaw.com

10 **D. Necessity for appearance by Applicant**

11 Applicant's is one of the counsel for Plaintiff and the proposed Class in
12 *Dam v. Perkins Coie, LLP, et al.*, Case No. 2:20-cv-00464-SAB (E.D. Wash.)
13 (the "Class Action"). Applicant has been admitted *pro hac vice* in the Class
14 Action.

15 Mr. Blood is the managing partner of Blood Hurst & O'Reardon, LLP and
16 specializes in class action litigation. Mr. Blood has significant experience leading
17 the litigation of complex class action lawsuits. He has been appointed lead
18 counsel by numerous state and federal courts, including in complex and
19 multidistrict litigation.

20 On June 18, 2018, Mark D. Waldron, the chapter 7 trustee in this matter,
21 filed a motion for an order to show cause why the nominal Class Action plaintiff
22 Jun Dam should not be sanctioned for violating the automatic stay by pursuing
23 the Class Action against non-debtors. ECF Nos. 889-90. Plaintiff's opposition to
24 Trustee's motion for an OSC is due July 22, 2021. Applicant desires to appear
25 and participate in this proceeding, including to present oral argument if
26 permitted.

27 **E. Disciplinary actions or sanctions**

28 Mr. Blood has no pending disciplinary sanction or actions and has never
 been subject to disciplinary sanctions by any court or Bar Association.

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will in turn automatically generate a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF System. The NEF for the foregoing specifically identifies recipients of electronic notice.

Executed on July 22, 2021.

s/ Dennis McGlothlin

DENNIS J. MCGLOTHIN